



## MISSOURI GEOLOGICAL SURVEY

May 9, 2019

Below is Chris Schaefer's comment and the program response for amendments to 10 CSR 23-3.090 which was submitted during the public comment period during the last rulemaking.

Comment #6: Chris Schaefer from Sunbelt Environmental proposed that the current sensitive area C should be expanded to include all of Christian County because of data that supports the rapid urbanization of Christian county and the presence of fractured cavernous limestone and pollutants which are able to migrate quickly, both vertically and horizontally. The same reasons that Sensitive Area C was made to begin with. Currently if someone lives just outside of sensitive area C (for instance in Highlandville MO) they would only be required to install a domestic water well with eighty feet (80') of casing (no less than fifteen feet (15') into bedrock). Highlandville has a fault system which runs through it, adding to the complexity of karst and secondary porosity in the form of fractures. One well in particular (with eighty feet (80') of casing) was proven to be contaminated by a neighboring livestock operation. This could have been avoided if sensitive area C had extended to include all of Christian county. The presence of the Northview shale allows people living in these areas to have access to clean water from the Ozarks Aquifer rather than from the Springfield Aquifer which has been well documented to have issues with surface contamination.

Response: This proposed amendment was part of the Red Tape Reduction Initiative pursuant to Executive Order 17-03. The purpose of this initiative was to remove burdensome restrictions and streamline government regulations. This proposal to expand Drill Area 9 (Sensitive Area C) to include all of Christian County is outside of the scope of the Red Tape Reduction Initiative, however this comment will be considered for future rulemaking efforts. No changes have been made to the rule as a result of this comment.